To: Albright, David[Albright.David@epa.gov]

From: Dermer, Michele

**Sent:** Tue 5/12/2015 4:43:40 PM

Subject: RE: Fruitvale oil field - Santa Margarita zone

## Ex. 5 - Deliberative Process

From: Albright, David

Sent: Tuesday, May 12, 2015 8:26 AM

To: Habel, Rob@DOC; Couch, Scott@Waterboards

Cc: Salera, Jerry@DOC; Dermer, Michele

Subject: RE: Fruitvale oil field - Santa Margarita zone

Yes, we should discuss. I am planning to be in Sacramento most of tomorrow (including the 1pm meeting), so maybe there is a time before 1pm when we can talk about this?

My schedule is somewhat flexible. Thanks, David

From: Habel, Rob@DOC [mailto:Rob.Habel@conservation.ca.gov]

Sent: Monday, May 11, 2015 4:53 PM

To: Couch, Scott@Waterboards; Albright, David

Cc: Salera, Jerry@DOC

Subject: RE: Fruitvale oil field - Santa Margarita zone

## Gentlemen:

The Division had a meeting today with the operator applying for an injection project and the issue of these wells was brought up by the applicant. They want to know how these wells can be injecting when the Division's position is that the zone is not exempt. Please let me know your thoughts regarding the situation. Please let me know when we can meet to discuss.

Thanks,

Rob

From: Habel, Rob@DOC

Sent: Monday, May 4, 2015 12:45 PM

To: Couch, Scott@Waterboards; Albright.David@epamail.epa.gov

Cc: Salera, Jerry (<u>Jerry Salera@conservation.ca.gov</u>)
Subject: Fruitvale oil field - Santa Margarita zone

Scott and David:

The Division has a project application for a disposal well in the Santa Margarita formation, in a portion of the field where there has never been any production. Although the Santa Margarita is an exempted zone, based upon our original primacy agreement as a hydrocarbon producing zone, the production was in the western side of the shaded area. The eastern side of the shaded area was indicating production from a shallower zone. The Division would like to setup a meeting to discuss this situation, since there are two disposal wells (Class I or V) that are regulated by either EPA and/or the Water Board to dispose of refinery waste in the same area for which the Division has the application. To be consistent, all of us need to be on the same page and agree to the steps necessary to either agree to permit this application or shut down those wells injecting into a non-exempt zone. Please let me know your availability for next week. Let me know if you have any questions.

Thanks,

Rob